



April 29, 2025

Mr. Thomas Hertlein  
CEO  
Kurz Transfer Products, LP  
11836 Patterson Road  
Huntersville, NC 28078

SUBJECT: Air Quality Permit No. 06542T29  
Facility ID: 2900268  
Kurz Transfer Products, LP  
Lexington  
Davidson County  
Fee Class: Title V  
PSD Class: Minor

Dear Mr. Hertlein:

In accordance with your completed Air Quality Permit Application for the renewal of your Title V permit, we are forwarding, herewith, Air Quality Permit No. 06542T29 authorizing the construction and operation of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been identified as such in the permit. Please note, the requirements for the annual compliance certification are contained in General Condition P in Section 4. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official, it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to file a petition for a contested case hearing in the North Carolina Office of Administrative Hearings. Information regarding the right, procedure, and time limit for permittees and other persons aggrieved to file such a petition is contained in the attached "Notice Regarding the Right to Contest a Division of Air Quality Permit Decision."

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to existing emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS



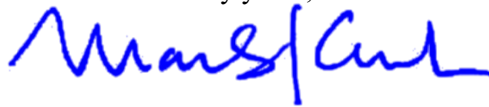
143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Davidson County has triggered increment tracking under PSD for PM<sub>10</sub>, PM<sub>2.5</sub> and NOx. However, this permit renewal does not consume or expand increments for any pollutants.

This Air Quality Permit shall be effective from April 29, 2025, until March 31, 2030, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations specified therein.

Should you have any questions concerning this matter, please contact Conzuela B. Cogdell, at (919) 707-8458 or [conzuela.cogdell@deq.nc.gov](mailto:conzuela.cogdell@deq.nc.gov).

Sincerely yours,



Mark J. Cuilla, EIT, CPM, Chief, Permitting Section  
Division of Air Quality, NCDEQ

Enclosure

c: Brad Akers, EPA Region 4 (Permit and Review)  
Laserfiche (2900268)

**NOTICE REGARDING THE RIGHT TO CONTEST A DIVISION OF AIR QUALITY PERMIT  
DECISION**

**Right of the Permit Applicant or Permittee to File a Contested Case:** Pursuant to NCGS 143-215.108(e), a permit applicant or permittee who is dissatisfied with the Division of Air Quality's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 in the Office of Administrative Hearings within 30 days after the Division notifies the applicant or permittee of its decision. If the applicant or permittee does not file a petition within the required time, the Division's decision on the application is final and is not subject to review. The filing of a petition will stay the Division's decision until resolution of the contested case.

**Right of Other Persons Aggrieved to File a Contested Case:** Pursuant to NCGS 143-215.108(e1), a person other than an applicant or permittee who is a person aggrieved by the Division's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 within 30 days after the Division provides notice of its decision on a permit application, as provided in NCGS 150B-23(f), or by posting the decision on a publicly available Web site. The filing of a petition under this subsection does not stay the Division's decision except as ordered by the administrative law judge under NCGS 150B-33(b).

**General Filing Instructions:** A petition for contested case hearing must be in the form of a written petition, conforming to NCGS 150B-23, and filed with the Office of Administrative Hearings, 1711 New Hope Church Road, Raleigh NC, 27609, along with a fee in an amount provided in NCGS 150B-23.2. A petition for contested case hearing form may be obtained upon request from the Office of Administrative Hearings or on its website at <https://www.oah.nc.gov/hearings-division/filing/hearing-forms>. Additional specific instructions for filing a petition are set forth at 26 NCAC Chapter 03.

**Service Instructions:** A party filing a contested case is required to serve a copy of the petition, by any means authorized under 26 NCAC 03 .0102, on the process agent for the Department of Environmental Quality:

Daniel S. Hirschman, General Counsel  
North Carolina Department of Environmental Quality  
1601 Mail Service Center  
Raleigh, North Carolina 27699-1601

If the party filing the petition is a person aggrieved other than the permittee or permit applicant, the party **must also** serve the permittee in accordance with NCGS 150B-23(a).

\* \* \*

Additional information is available at <https://www.oah.nc.gov/hearings-division/hearing-process/filing-contested-case>. Please contact the OAH at 984-236-1850 or [oah.postmaster@oah.nc.gov](mailto:oah.postmaster@oah.nc.gov) with all questions regarding the filing fee and/or the details of the filing process.

## Summary of Changes to Permit

The following changes were made to Air Permit No. 06542T28: \*

Page No.	Section	Description of Changes
NA	Cover Letter	<ul style="list-style-type: none"> <li>Updated cover letter date, header, permit number etc.</li> </ul>
NA	Throughout	<ul style="list-style-type: none"> <li>Updated dates, permit number etc.</li> </ul>
4	2.1 A.4	<p style="text-align: center;"><b>MACT 02D .1111 Condition</b></p> <ul style="list-style-type: none"> <li>Corrected the recordkeeping requirement at Section 2.1 A.4.o.iv as follows to reflect the original intent of the condition when drafted for permit revision No. T28 (i.e., fixed an erroneous reference) and to highlight the recordkeeping requirement was added pursuant to 15A NCAC 02Q .0508(f) to facilitate practical enforceability</li> </ul> <p style="text-align: center;">From:</p> <p>iv. maintain for each RTO and, if applicable, each operating scenario as defined in Section 2.1 A.5.b below, the following records consistent <b>with iv above</b>:</p> <p>(A) the 3-hour average temperature limits applicable over the previous 5 years; and</p> <p>(B) the date of the performance test on which each 3-hour average temperature limit <b>in i above</b> was established.</p> <p style="text-align: center;">To:</p> <p>iv. maintain for each RTO and, if applicable, each operating scenario as defined in Section 2.1 A.5.b below, the following records consistent <b>with vi below</b>:</p> <p>(A) the 3-hour average temperature limits applicable over the previous 5 years; and</p> <p>(B) the date of the performance test on which each 3-hour average temperature limit in <b>Section 2.1 A.4.i above</b> was established. [15A NCAC 02Q .0508(f)]</p> <ul style="list-style-type: none"> <li>To the recordkeeping requirement at Section 2.1 A.4.o.v, added reference to 15A NCAC 02Q .0508(f) to highlight that the recordkeeping requirement was added pursuant to 15A NCAC 02Q .0508(f) to facilitate practical enforceability.</li> <li>Corrected the existing reporting condition at Section 2.1 A.4.p.iv as follows to reflect the original intent of the condition when drafted for permit revision No. T28 (i.e., fixed an erroneous reference) and to highlight the reporting requirement was added pursuant to 15A NCAC 02Q .0508(f) to facilitate practical enforceability:</li> </ul> <p style="text-align: center;">From:</p> <p>The summary report shall also include the information in Section <b>2.1 A.4.o.v and vi above</b>.</p> <p style="text-align: center;">To:</p> <p>The summary report shall also include the information in Section <b>2.1 A.4.o.iv and v above</b>. [15A NCAC 02Q .0508(f)]</p>

Page No.	Section	Description of Changes
15	Section 2.2 A.3	<ul style="list-style-type: none"> <li>A permit condition addressing the “Disclosure of Information Relating to Emissions of Fluorinated Chemicals [15A NCAC 02Q. 0308(a); 15A NCAC 02Q.0309(b)” was added to permit. This permit condition is state enforceable only.</li> </ul>
16	Section 3	<ul style="list-style-type: none"> <li>Updated IAK801 description to “One vacuum chamber installed on the metalizing process”</li> </ul>
17	Section 4	<ul style="list-style-type: none"> <li>General Conditions (GC) version 7.0 (08/21/2023) updated to version 8.0 (07/10/2024). Changes include: modification to GC D to only require one copy of documents, reports, etc. except as otherwise specified.</li> </ul>

\* This list is not intended to be a detailed record of every change made to the permit but a summary of those changes.



State of North Carolina  
Department of Environmental Quality  
Division of Air Quality

## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
06542T29	06542T28	April 29, 2025	March 31, 2030

NOTE: Per General Condition K, a permit application for the renewal of this Title V permit shall be submitted no later than September 30, 2029.

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

**Permittee:** Kurz Transfer Products, LP  
**Facility ID:** 2900268  
**Primary SIC Code:** 2754  
**NAICS Code:** 323111

**Facility Site Location:** 4939 North NC Highway 150  
**City, County, State, Zip:** Lexington, Davidson County, NC 27295  
**Mailing Address:** 11836 Patterson Road  
**City, State, Zip:** Huntersville, NC 28078

**Application Number:** 2900268.24B  
**Complete Application Date:** November 8, 2024

**Division of Air Quality:** Winston-Salem Regional Office  
**Regional Office Address:** 450 West Hanes Mill Road, Suite 300  
Winston-Salem, NC 27105

Permit issued this the 29th of April 2025

A handwritten signature in blue ink, appearing to read 'Mark J. Cuilla', is written over a horizontal line.

Mark J. Cuilla, EIT, CPM, Chief, Air Permitting Section  
By Authority of the Environmental Management Commission

## Table of Contents

### LIST OF ACRONYMS

SECTION 1:	PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES
SECTION 2:	SPECIFIC LIMITATIONS AND CONDITIONS
2.1	Emission Source(s) Specific Limitations and Conditions (Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)
2.2	Multiple Emission Source(s) Specific Limitations and Conditions (Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)
SECTION 3:	INSIGNIFICANT ACTIVITIES PER 15A NCAC 02Q .0503(8)
SECTION 4:	GENERAL PERMIT CONDITIONS

## List of Acronyms

<b>AOS</b>	Alternative Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>BAE</b>	Baseline Actual Emissions
<b>Btu</b>	British thermal unit
<b>CAA</b>	Clean Air Act
<b>CAM</b>	Compliance Assurance Monitoring
<b>CEMS</b>	Continuous Emission Monitoring System
<b>CEDRI</b>	Compliance and Emissions Data Reporting Interface
<b>CFR</b>	Code of Federal Regulations
<b>CO</b>	Carbon Monoxide
<b>COMS</b>	Continuous Opacity Monitoring System
<b>CSAPR</b>	Cross-State Air Pollution Rule
<b>DAQ</b>	Division of Air Quality
<b>DEQ</b>	Department of Environmental Quality
<b>EMC</b>	Environmental Management Commission
<b>EPA</b>	Environmental Protection Agency
<b>FR</b>	Federal Register
<b>GACT</b>	Generally Available Control Technology
<b>GHGs</b>	Greenhouse Gases
<b>HAP</b>	Hazardous Air Pollutant
<b>LAER</b>	Lowest Achievable Emission Rate
<b>MACT</b>	Maximum Achievable Control Technology
<b>NAA</b>	Non-Attainment Area
<b>NAAQS</b>	National Ambient Air Quality Standards
<b>NAICS</b>	North American Industry Classification System
<b>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAP</b>	National Emission Standards for Hazardous Air Pollutants
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NSPS</b>	New Source Performance Standard
<b>NSR</b>	New Source Review
<b>OAH</b>	Office of Administrative Hearings
<b>PAE</b>	Projected Actual Emissions
<b>PAL</b>	Plantwide Applicability Limitation
<b>PM</b>	Particulate Matter
<b>PM<sub>2.5</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 2.5 Micrometers or Less
<b>PM<sub>10</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
<b>POS</b>	Primary Operating Scenario
<b>PSD</b>	Prevention of Significant Deterioration
<b>PTE</b>	Potential to Emit
<b>RACT</b>	Reasonably Available Control Technology
<b>SIC</b>	Standard Industrial Classification
<b>SIP</b>	State Implementation Plan
<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>TAP</b>	Toxic Air Pollutant
<b>tpy</b>	Tons Per Year
<b>VOC</b>	Volatile Organic Compound



## SECTION 1 - PERMITTED EMISSION SOURCE (S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE (S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES01 <b>MACT JJJJ</b>	Coating operations consisting of two coating lines (LM06 and LM81) operating within a permanent total enclosure (PTE-1)	RTO-1  OR  RTO-3	One natural gas-fired regenerative thermal oxidizer (16 million Btu per hour maximum heat input rate)  OR  One natural gas-fired regenerative thermal oxidizer (12 million Btu per hour maximum heat input rate)
ES05 <b>MACT JJJJ</b>	One coating line (LM84) operating within a permanent total enclosure (PTE-2)		
ES02	Mixing operations consisting of seven to 20 mixing stations operating within a permanent total enclosure (PTE-1)		
ES03	Parts cleaning tank operating within a permanent total enclosure (PTE-1)		
ES07	Parts cleaning tank operating within a permanent total enclosure (PTE-2)		
ES09	One automated kettle washer with integral solvent recovery condenser		
ES10 <b>MACT JJJJ</b>	Coating operations consisting of two coating lines (LM802 and LM803) operating within a permanent total enclosure (PTE-4)		
ES11	One automated kettle washer with integral solvent recovery condenser		
ES08 <b>MACT JJJJ</b>	One coating line (LM801) operating within a permanent total enclosure (PTE-3)	RTO-2	One natural gas -fired regenerative thermal oxidizer (5.0 million Btu per hour maximum heat input rate)

## SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

### 2.1 Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

#### A. The following sources:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES01 <b>MACT JJJJ</b>	Coating operations consisting of two coating lines (LM06 and LM81) operating within a permanent total enclosure (PTE-1)	RTO-1	One natural gas-fired regenerative thermal oxidizer (16 million Btu per hour maximum heat input rate)
ES05 <b>MACT JJJJ</b>	One coating line (LM84) operating within a permanent total enclosure (PTE-2)		
ES02	Mixing operations consisting of seven to 20 mixing stations operating within a permanent total enclosure (PTE-1)		
ES03	Parts cleaning tank operating within a permanent total enclosure (PTE-1)		
ES07	Parts cleaning tank operating within a permanent total enclosure (PTE-2)		
ES09	One automated kettle washer with integral solvent recovery condenser	RTO-3	OR  One natural gas-fired regenerative thermal oxidizer (12 million Btu per hour maximum heat input rate)
ES10 <b>MACT JJJJ</b>	Coating operations consisting of two coating lines (LM802 and LM803) operating within a permanent total enclosure (PTE-4)		
ES11	One automated kettle washer with integral solvent recovery condenser		
ES08 <b>MACT JJJJ</b>	One coating line (LM801) operating within a permanent total enclosure (PTE-3)	RTO-2	One natural gas-fired regenerative thermal oxidizer (5.0 million Btu per hour maximum heat input rate)

The following table provides a summary of limits and standards for the emission sources described above:

Pollutant	Limits/Standards	Applicable Regulation
Particulate Matter	$E = 4.10 \times P^{0.67}$ , for process rates $\leq 30$ tons per hour, OR $E = 55 \times P^{0.11} - 40$ , for process rates $> 30$ tons per hour Where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 02D .0515
Sulfur Dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible Emissions	20 percent opacity	15A NCAC 02D .0521
Hazardous Air Pollutants	95% reduction ( <b>ES01, ES05, ES08 and ES10 only</b> ) <b>See Section 2.1 A.4</b>	15A NCAC 02D .1111 40 CFR 63 Subpart JJJJ
Odors	Odorous emissions must be controlled <b>State-enforceable only</b> <b>See Section 2.2 A.1</b>	15A NCAC 02D .1806
Volatile Organic Compounds	Less than or equal to 230 tons per year <b>See Section 2.2 A.2</b>	15A NCAC 02Q .0317 for 15A NCAC 02D .0530

Pollutant	Limits/Standards	Applicable Regulation
NA	Recordkeeping of operating scenarios as defined at Section 2.1 A.5	15A NCAC 02Q .0508(j)
NA	Disclosure of Information Relating to Emissions of Fluorinated Chemicals <b>State-enforceable only</b> <b>See Section 2.2 A.3</b>	15A NCAC 02Q. 0308(a); 15A NCAC 02Q.0309(b)

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad (\text{for process rates less than or equal to 30 tons per hour}), \text{ or}$$

$$E = 55.0 \times P^{0.11} - 40 \quad (\text{for process rates greater than 30 tons per hour})$$

Where E = allowable emission rate in pounds per hour  
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring, recordkeeping or reporting is required for particulate matter emissions from these sources.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping is required for sulfur dioxide emissions from the firing of natural gas in these sources.

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent, not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas in these sources.

#### 4. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

**Applicability** [40 CFR 63.3300]

- a. For the web coating lines (**ID No. ES01, ES05, ES08, and ES10**), the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR Part 63 Subpart JJJJ "National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating" and Subpart A "General Provisions."

**Definitions and Nomenclature**

- b. For the purposes of this permit condition (Section 2.1 A.4), the definitions and nomenclature contained in 40 CFR 63.3310 shall apply.

**40 CFR Part 63 Subpart A General Provisions**

- c. The Permittee shall comply with the requirements of 40 CFR Part 63 Subpart A General Provisions according to the applicability of Subpart A to such sources as identified in Table 2 to 40 CFR Part 63 Subpart JJJJ. [40 CFR 63.3340(d)]

**General Compliance Requirements** [15A NCAC 02Q .0508(b)]

- d. The following general compliance requirements apply:
  - i. Each source shall be in compliance with the emission limits specified in Section 2.1 A.4.e below, and the operating limits specified in Section 2.1 A.4.g below at all times, including periods of startup, shutdown, and malfunction. [40 CFR 63.3340(a)]
  - ii. The Permittee shall always operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the DAQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.3340(b)]

**Emission Standards** [15A NCAC 02Q .0508(b)]

- e. For the web coating lines, the Permittee shall limit:
  - i. the organic HAP emissions to no more than 5 percent of the organic HAP applied each month (95 percent reduction) [40 CFR 63.3320(b)(1)]; or
  - ii. during the months in which an operating limit deviation, as defined in Section 2.1 A.4.f.ii below, occurs, the total mass of organic HAP emitted based on HAP applied to no more than 0.05 kg organic HAP per kg HAP applied. [40 CFR 63.3370(r)(3)(i)]

**Compliance Determination Method** [15A NCAC 02Q .0508(b)]

- f. The following compliance determination method applies:
  - i. The Permittee shall determine compliance with the emission limits in Section 2.1 A.4.e above by the use of capture and control system(s) consisting of permanent total enclosure(s) and thermal oxidizers. [40 CFR 63.3370(a)(5)(i)]
  - ii. For purposes of determining compliance with Section 2.1 A.4.e, an operating limit deviation occurs on a given web coating line for each 3-hour period:
    - (A) where the 3-hour average thermal oxidizer combustion temperature falls more than 50 degrees F below the temperature in Section 2.1 A.4.g below, or
    - (B) the capture system operating parameter is not operated at an average value greater than or less than (as appropriate) the operating parameter value established at Section 2.1 A.4.k below. [40 CFR 63.3370(l)(3)]
  - iii. If an operating limit deviation occurs during the monthly averaging period, the Permittee, for each 3-hour period in which an operating limit deviation occurred, shall assume no capture or control of emissions for that web coating line. [40 CFR 63.3370(l)(4)]
  - iv. For each month in which an operating limit deviation occurred, the Permittee shall determine compliance with the emission limits in Section 2.1 A.4.e.ii for that month using the mass balance approach consistent with 40 CFR 63.3370(r). [40 CFR 63.3370(r)(3)(i)]

- v. For each month in which an operating limit deviation did not occur, the requirements in f.iv above do not apply. The Permittee shall comply with the emission limits in Section 2.1 A.4.e.i by complying with the operating limits in Section 2.1 A.4.g and Section 2.1 A.4.i.
- vi. ***Control Destruction Efficiency Curve Development***
  - (A) If the Permittee is using one or more add-on control devices other than a solvent recovery system for which the Permittee conducts a liquid-liquid material balance to comply with the emission standards in 40 CFR 63.3320, the Permittee may establish a control destruction efficiency curve for use in estimating emissions that occur during deviations of the 3-hour operating parameters. This curve can be generated using test data or manufacturer's data that specifically documents the level of control at varying temperatures for your control device. [40 CFR 63.3360(e)(4)]
  - (B) The Permittee shall submit a permit modification application consistent with 15A NCAC 02Q .0500 to incorporate and/or revise the appropriate monitoring recordkeeping and reporting requirements associated with the implementation of the control destruction efficiency curve(s) described in vi(A) above prior to their use.

If these compliance determination method requirements are not met or if the emissions exceed the limits in Section 2.1 A.4.e above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**RTO Monitoring and Operating Limits** [15A NCAC 02Q .0508(f)]

- g. The following monitoring requirements apply:
  - i. For each thermal oxidizer, the average combustion temperature in any 3-hour period (i.e., 3-hour rolling average) shall not fall more than 50°F below the combustion temperature limit established during the most recent performance test. [40 CFR 63.3321(a), Table 1 to 40 CFR Part 63 Subpart JJJJ]
  - ii. Operation below the DAQ approved minimum operating limit in i above shall constitute a deviation of the established operating limit except during a performance test conducted to determine compliance with an emission limit or to establish a new operating limit. Operating limits must be confirmed or reestablished during performance tests.
  - iii. The operating limits in i above become final upon review and approval of the test report submitted to the DAQ pursuant to Section 2.1 A.4.q.ii below.
- h. For each thermal oxidizer, the Permittee shall:
  - i. Install, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications.
  - ii. Install, operate, and maintain a temperature monitoring device equipped with a continuous recorder.
    - (A) The device must be capable of monitoring temperature with an accuracy of  $\pm 1$  percent of the temperature being monitored in degrees Fahrenheit, or  $\pm 1.8$  degrees Fahrenheit, whichever is greater.
    - (B) The temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
  - iii. For temperature sensors, you must develop a quality control program that must contain, at a minimum, a written protocol that describes the procedures for verifying that the temperature sensor is operating properly using at least one of the methods in paragraphs (iii)(A) through (F) below. The owner or operator shall keep these written procedures on record for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the DAQ:
    - (A) Semiannually, compare measured readings to a National Institute of Standards and Technology (NIST) traceable temperature measurement device or simulate a typical operating temperature using a NIST traceable temperature simulation device. When the temperature measurement device method is used, the sensor of the calibrated device must be placed as close as practicable to the process sensor, and both devices must be subjected to the same environmental conditions. The accuracy of the temperature measured must be 2.5 percent of the temperature measured by the NIST traceable device or 5 degrees Fahrenheit whichever is greater.
    - (B) Annually validate the temperature sensor by following applicable mechanical and electrical validation procedures in the manufacturer owner's manual.
    - (C) Annually request the temperature sensor manufacturer to certify or re-certify electromotive force (electrical properties) of the thermocouple.
    - (D) Annually replace the temperature sensor with a new certified temperature sensor in lieu of validation.
    - (E) Permanently install a redundant temperature sensor as close as practicable to the process temperature sensor. The sensors must yield a reading within 2.5 percent of each other for thermal oxidizers and catalytic oxidizers.
    - (F) Permanently install a temperature sensor with dual sensors to account for the possibility of failure.
  - iv. Conduct the validation checks in paragraphs (iii)(A), (B), or (C) above any time the temperature sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.

- v. At least quarterly, inspect temperature sensor components for proper connection and integrity or continuously operate an electronic monitoring system designed to notify personnel if the signal from the temperature sensor is interrupted.

[40 CFR 63.3350(e)(10)]

If these monitoring requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Permanent Total Enclosure Monitoring** [15A NCAC 02Q .0508(f)]

- i. For each permanent total enclosure, the Permittee shall maintain the permanent total enclosure operating parameter(s) at an average value greater than or less than (as appropriate) the operating parameter value(s) established pursuant to the site-specific monitoring plan specified in Section 2.1 A.4.k below. [40 CFR 63.3370(l)(3)]  
If these monitoring requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.
- j. Each permanent total enclosure shall meet the following criteria as defined pursuant to 40 CFR 51 Appendix M, Method 204, Section 6:
  - i. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
  - ii. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - iii. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
  - iv. All access doors and windows whose areas are not included in paragraph (ii) above and are not included in the calculation in paragraph (iii) above shall be closed during routine operation of the process.
  - v. All VOC emissions must be captured and contained for discharge through a control device.

[40 CFR 63.3360(f)(1)]  
If these monitoring requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.
- k. For each permanent total enclosure, the Permittee shall:
  - i. develop a site-specific monitoring plan containing the information below. The monitoring plan must:
    - (A) identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained;
    - (B) explain why this parameter is appropriate for demonstrating ongoing compliance;
    - (C) identify the specific monitoring procedures; and
    - (D) specify the operating parameter value or range of values that demonstrate compliance with the emission standards in Section 2.1 A.4.e. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

[40 CFR 63.3350(f)(1), (2)]
  - ii. monitor the capture system in accordance the plan. The Permittee shall make the monitoring plan available for inspection by the permitting authority upon request. [40 CFR 63.3350(f)(3)]
  - iii. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit. [40 CFR 63.3350(f)(4)]
  - iv. review and update the capture system monitoring plan at least annually. [40 CFR 63.3350(f)(5)]

If these monitoring requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Continuous Parameter Monitoring Systems (CPMS) Requirements** [15A NCAC 02Q .0508(f)]

- l. The Permittee shall install, operate, and maintain each CPMS for each thermal oxidizer and permanent total enclosure as specified in Sections 2.1 A.4.h and k above, as follows [40 CFR 63.3350(e)]:
  - i. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. The Permittee shall have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
  - ii. The Permittee shall have valid data from at least 90 percent of the hours during which the process operated.
  - iii. The Permittee shall determine the hourly average of all recorded readings as follows:
    - (A) To calculate a valid hourly value, the Permittee shall have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
    - (B) Provided all of the readings recorded in accordance with this paragraph (iii) clearly demonstrate continuous compliance with the standard that applies, then the Permittee is not required to determine the hourly

average of all recorded readings.

- iv. The Permittee shall determine the 3-hour block average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, the Permittee shall have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).
- v. Except for temperature sensors, the Permittee shall develop a quality control program that must contain, at a minimum, a written protocol that describes the procedures for each of the operations in 40 CFR 63.3350(e)(5)(i) through (vi). The owner or operator shall keep these written procedures on record for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the DAQ. If the performance evaluation plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by the DAQ, for a period of 5 years after each revision to the plan. For temperature sensors, the Permittee shall follow the requirements in 40 CFR 63.3350(e)(10).
  - (A) initial and any subsequent calibration of the continuous monitoring system (CMS);
  - (B) determination and adjustment of the calibration drift of the CMS;
  - (C) preventative maintenance of the CMS, including spare parts inventory;
  - (D) data recording, calculations, and reporting;
  - (E) accuracy audit procedures, including sampling and analysis methods; and
  - (F) program of corrective action for a malfunctioning CMS.
- vi. The Permittee shall record the results of each inspection, calibration, and validation check of the CPMS.
- vii. At all times, the Permittee shall maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- viii. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the Permittee shall conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in 40 CFR 63.3370. The Permittee shall use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- ix. Any averaging period for which the Permittee does not have valid monitoring data and such data are required constitutes a deviation, and the Permittee shall notify the DAQ in accordance with 40 CFR 63.3400(c). [40 CFR 63.3350(e)(1) through (9)]
- x. At the request of the Permittee, the language in this paragraph is being added to clarify the RTO temperature monitoring requirements. The Permittee has stated that each coating line is interlocked with its respective RTO. The coating lines can only operate when the 20 second setpoint temperature reading is equal to or greater than the respective value in Section 2.1 A.4.g.i. Consistent with iii.(B) above, the Permittee may rely on the 20 second readings in lieu of 3-hour rolling averages to determine compliance with Section 2.1 A.4.g.i.

If these monitoring requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

#### **Testing** [15A NCAC 02Q .0508(f)]

- m. The following testing requirements apply:
  - i. All tests shall be conducted in accordance with 40 CFR 63.3340(c), 63.3360 and 63.7, as applicable.
  - ii. The Permittee shall conduct initial performance testing within 180 days of startup of either coating line (**ID No. ES10**) or the routing of the other existing coating lines to the RTO (**ID No. RTO-3**), whichever comes first. [40 CFR 63.3330, 63.7(a)(2)]
  - iii. For each RTO and coating line, the Permittee shall conduct a performance test once every 5 years according to 40 CFR 63.3360(e). [40 CFR 63.3360(a)]
  - iv. Each test shall be conducted within 60 months of the previous performance test. [40 CFR 63.3330(a)(2)]
  - v. Process information of the conditions in existence at the time of each performance test shall be collected according to 40 CFR 63.3360(e)(2).
  - vi. The Permittee shall confirm or reestablish the 3-hour average combustion temperature limit during performance tests. [40 CFR 63.3360(e)(3)]
  - vii. Multiple performance tests may be required to obtain all permitted representative normal operating conditions consistent with 63.7(e).

If these testing requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Notifications** [15A NCAC 02Q .0508(f)]

- n. The Permittee shall as necessary:
  - i. submit a Notification of Performance Test as specified in 40 CFR 63.7 and 40 CFR 63.9(e). This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. [40 CFR 63.3400(d)]
  - ii. submit the Notification of Performance Test at least 60 calendar days before each performance test is scheduled to begin to allow the DAQ, upon request, to review and approve the site-specific test plan required under 40 CFR 63.7(c) and to have an observer present during the test. [40 CFR 63.7(b)(1)]

If these notification requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- o. The Permittee shall:
  - i. maintain the records specified in 40 CFR 63.10(b)(2) [*i.e., Start up, shut down, malfunction, maintenance and CPMS records*] of all measurements needed to demonstrate compliance with this standard on a monthly basis, including the following:
    - (A) control device and capture system operating parameter data in accordance with the requirements of Sections 2.1 A.4.g through l.
    - (B) organic HAP content data for the purposes of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(c) (*i.e., Section 2.1 A.4.e.ii*).
    - (C) volatile matter and coating solids content data for the purposes of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(d) (*i.e., Section 2.1 A.4.e.ii*).
    - (D) overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of 40 CFR 63.3360(e) and (f).
    - (E) material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of 40 CFR 63.3370(b), (c), and (d) (*i.e., Section 2.1 A.4.e.ii*).
  - [40 CFR 63.3410(a)(1)]
  - ii. maintain the following records for each CPMS (CMS) on a monthly basis:
    - (A) all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
    - (B) the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
    - (C) the date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7);
    - (D) the specific identification (*i.e., the date and time of commencement and completion*) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of the affected source;
    - (E) the specific identification (*i.e., the date and time of commencement and completion*) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shutdowns, and malfunctions of the affected source;
    - (F) the nature and cause of any malfunction (if known);
    - (G) the corrective action taken or preventive measures adopted;
    - (H) the nature of the repairs or adjustments to the CMS that was inoperative or out of control;
    - (I) the total process operating time during the reporting period; and
    - (J) all procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d).
  - [40 CFR 63.3410(a)(2), 40 CFR 63.10(c)]
  - iii. For each deviation from an operating limit occurring at an affected source, the Permittee shall record the following information.
    - (A) The total operating time the web coating line(s) controlled by the corresponding add-on control device and/or emission capture system during the reporting period.
    - (B) Date, time, duration, and cause of the deviations.



(C) If the facility determines by its monthly compliance demonstration, in accordance with 40 CFR 63.3370, as applicable, that the source failed to meet an applicable emission limit of this subpart, you must record the following for the corresponding affected equipment:

- (1) Record an estimate of the quantity of HAP (or VOC if used a surrogate in accordance with 40 CFR 63.3360(d)) emitted in excess of the emission limit for the month, and a description of the method used to estimate the emissions.
- (2) Record actions taken to minimize emissions in accordance with Section 2.1 A.4.d, and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

[40 CFR 63.3410(c)]

iv. maintain for each RTO and, if applicable, each operating scenario as defined in Section 2.1 A.5.b below, the following records consistent with vi below:

- (A) the 3-hour average temperature limits applicable over the previous 5 years; and
- (B) the date of the performance test on which each 3-hour average temperature limit in Section 2.1 A.4.i above was established.

[15A NCAC 02Q .0508(f)]

v. maintain, for each month, records of the operating scenarios as defined in Section 2.1 A.5.b below. [15A NCAC 02Q .0508(f)]

vi. maintain files of all information (including all reports and notifications) required by Sections 2.1 A.4.a through o in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]

If these recordkeeping requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

#### **Reporting** [15A NCAC 02Q .0508(f)]

##### **Semiannual reporting**

p. The following semiannual reporting requirements apply:

- i. The Permittee shall submit a summary report of monitoring and recordkeeping activities to the DAQ, postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. [40 CFR 63.3400(c)(1)] All instances of noncompliance with the requirements of this permit must be clearly identified.
- ii. In addition to i above, prior to the electronic template being available in CEDRI for one year, the summary report must also be postmarked or delivered by the aforementioned dates to the EPA. After the electronic template has been available in CEDRI for one year, the next full report must be submitted electronically as described in 40 CFR 63.3400(h). [40 CFR 63.3400(c)(1)(ii)]
- iii. The summary report shall contain the following:
  - (A) Company name and address.
  - (B) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
  - (C) Date of report and beginning and ending dates of the reporting period.
  - (D) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
  - (E) For each deviation from an emission limit at an affected source where you are using a CPMS to comply with the emission limitation in this subpart, the report must include the following information:
    - (1) The total operating time of web coating line(s) during the reporting period.
    - (2) The date and time that each CPMS, if applicable, was inoperative except for zero (low-level) and high-level checks.
    - (3) The date and time that each CPMS, if applicable, was out-of-control, including the information in 40 CFR 63.8(c)(8).
    - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
    - (5) A summary of the total duration (in hours) of each deviation during the reporting period and the total duration of each deviation as a percent of the total source operating time during that reporting period.

- (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
  - (7) A summary of the total duration (in hours) of CPMS downtime during the reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that reporting period.
  - (8) A breakdown of the total duration of CPMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.
  - (9) The date of the latest CPMS certification or audit.
  - (10) A description of any changes in CPMS or controls since the last reporting period.
  - (11) An estimate of the quantity of each regulated pollutant emitted over the emission limits in 40 CFR 63.3320 for each monthly period covered in the report if the source failed to meet an applicable emission limit of this subpart.
- [40 CFR 63.3400(c)(2)]
- iv. The summary report shall also include the information in Section 2.1 A.4.o.iv and v above. [15A NCAC 02Q .0508(f)]
- If these reporting requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Performance Test Reports**

- q. The following performance testing reporting requirements apply:
    - i. The Permittee shall submit performance test reports as specified in 40 CFR 63.10(d)(2). Within 60 days after the date of completing each performance test, the performance test report shall be submitted to the EPA following the procedures specified in 40 CFR 63.3400(f)(1) through (3). The report shall be submitted electronically using the procedure in 40 CFR 63.3400(h). [40 CFR 63.3400(f)]
    - ii. The performance test reports shall also be submitted to the DAQ pursuant to General Condition D within 60 days after the date of completing each performance test. [40 CFR 63.10(d)(2)]
    - iii. The test report shall explicitly state the applicable 3-hour average combustion temperature limit confirmed or established as a result of the performance test and the operating scenarios as defined in Section 2.1 A.5.b below for which the test(s) is conducted.
- If these reporting requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**CMS (CPMS) performance evaluation reports**

- r. The following performance evaluation reporting requirements apply:
    - i. The Permittee shall submit the results of performance evaluations to the EPA within 60 days of completing each CMS performance evaluation (as defined in 40 CFR 63.2) following the procedures specified in 40 CFR 63.3400(g)(1) through (3). The reports shall be submitted electronically using the procedure in 40 CFR 63.3400(h). [40 CFR 63.3400(g)]
    - ii. These reports shall continue to be submitted to the DAQ pursuant to General Condition D.
- If these reporting requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**5. 15A NCAC 02Q .0508(j)(1): OPERATING SCENARIOS**

- a. The Permittee, contemporaneously making a change from one operating scenario to another, shall record in a logbook (written or electronic format) the scenario under which it is operating.
  - b. An operating scenario is defined for purposes of this condition as follows: For each emission source in Table 2.1 A above, the RTO that is controlling its emissions.
- If these recordkeeping requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02Q .0508.

## 2.2 Multiple Emission Source(s) Specific Limitations and Conditions

### A. Facility-wide emission sources

#### State-enforceable only

#### 1. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

#### 2. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. In order to avoid applicability of 15A NCAC 02D .0530(g) for major modifications, all sources of VOC emissions, excluding those in Sections 2.2 A.2.c.vii and viii below, shall discharge into the atmosphere less than 230 tons of volatile organic compounds per consecutive 12-month period.

#### Testing [15A NCAC 02Q .0508(f)]

- b. The Permittee shall meet the testing requirements in Section 2.1 A.4.m. If these testing requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

#### Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. The following requirements apply:

#### RTO-controlled sources

- i. The Permittee shall meet the MACT JJJJ monitoring and recordkeeping requirements in Section 2.1 A.4.g through k and o.
- ii. The Permittee shall keep records of the VOC content in the coating materials and solvents and shall calculate the VOC emissions after control from the coating lines and kettle washers each month.
- (A) The amount of VOCs entering an RTO from the web coating lines ( $VOC_{in, CL}$ ) shall be calculated as follows:
- (1) For each VOC-containing material used in any web coating lines facility-wide, multiply the amount of material consumed during the month by the VOC content of the material.
  - (2) Sum all values determined in (1) above. The resulting value is the facility-wide total amount of VOC consumed by all coating lines in units of tons.
- (B) The amount of VOCs entering an RTO from any kettle washer ( $VOC_{in, KW}$ ) shall be calculated as follows:
- (1) For each VOC-containing material used in any kettle washer, multiply the amount of material consumed during the month by the VOC content of the material.
  - (2) Sum all values determined in (1) above. The resulting value is the facility-wide total amount of VOC consumed by all kettle washers in units of tons.
- (C) The VOC emissions after RTO control ( $VOC_{out, RTO}$ ) shall be calculated as follows:

$$VOC_{out, RTO} = (VOC_{in, CL} + VOC_{in, KW}) \times (1 - CE)$$

Where: CE equals the control efficiency (CE) of the RTO with the lowest CE used that month divided by 100

- iii. The CE for a given month shall be the CE of the RTO with the lowest CE as determined from an approved performance test according to Section 2.1 A.4.m. For a given RTO, only the most recent performance test result may be considered. The CE as determined from an approved performance test shall be available for use starting the month after the performance test is completed.
- iv. For a given month that an operating limitation deviation occurs as defined in Section 2.1 A.4.f.ii, the Permittee shall calculate  $VOC_{out, RTO}$  using the mass balance approach consistent with Section 2.1 A.4.f.iii and iv.
- v. The Permittee shall also calculate for each month a rolling 12-month total of  $VOC_{out, RTO}$  including the preceding 11 months.
- vi. The results of the calculations and the total amount of VOC emissions shall be recorded monthly in a logbook (written or electronic format) and made available to an authorized representative upon request.

**Uncontrolled VOC sources**

vii. No monitoring or recordkeeping is required for all other sources of VOC emissions facility-wide not addressed in ii above or viii below. The combined PTE for these sources is less than 11 tpy of VOC.

**Combustion sources**

viii. No monitoring or recordkeeping is required for the facility-wide sources of VOC emissions resulting from combustion. The combined PTE for these sources is conservatively estimated to be less than 1 tpy of VOC.

If these monitoring and recordkeeping requirements are not met, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

**Reporting** [15A NCAC 02Q.0508(f)]

- d. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. The report shall contain the following:
  - i. A summary of the VOC content of the coating materials and solvents.
  - ii. The monthly VOC emissions for the previous 17 months. Total VOC emissions must be calculated for each of the 12-month periods over the previous 17 months.

**State-enforceable only**

**3. Disclosure of information relating to emissions of fluorinated chemicals**

[15A NCAC 02Q. 0308(a); 15A NCAC 02Q.0309(b)]

The Permittee shall have an ongoing duty to disclose the presence of materials containing fluorinated chemicals at the facility that have the potential to result in the emission of fluorinated chemicals to the environment. Such disclosures shall be in writing and submitted to the Regional Office Supervisor within thirty days of the Permittee becoming aware of such information, unless such information has already been disclosed to DAQ by the Permittee. The disclosure shall describe the identity, quantity, and use of such material to the extent known. DAQ may require the permittee to conduct analysis or testing of fluorinated chemical emissions as necessary to properly evaluate emissions sources at the facility. As used in this condition, the term “fluorinated chemicals” includes but is not limited to per- and polyfluoroalkyl substances (PFAS).

**SECTION 3 - INSIGNIFICANT ACTIVITIES PER 15A NCAC 02Q .0503(8)**

<b>Emission Source ID No.</b>	<b>Emission Source Description<sup>1,2</sup></b>
IWSD	One waste solvent distillation unit
IAK83	One vacuum chamber installed on the metalizing process
IAK801	One vacuum chamber installed on the metalizing process
IESCC	Cylinder cleaner
IWK82 and IWK06	Two conditioners
IESPW	Parts washer
IES-RDLH	R&D Lab Hood
IES-T1	Single compartment underground storage tank, MEK (12,000 gallon capacity)
IES-T8	Single compartment underground storage tank, Ethanol (12,000 gallon capacity)
IES-T4-3	Double compartment underground storage tank, IPA and Propyl Cellosolve (8,000 and 2,000 gallon capacity respectively)
IES-T5-7-2	Triple compartment underground storage tank, Toluene, Ethyl Acetate and Acetone (4,000 gallon capacity each)
IES-T6	Single compartment underground storage tank, Isopar (4,000 gallon capacity)
IES-EG <b>MACT ZZZZ, NSPS JJJJ</b>	One 81 hp natural gas-fired emergency generator (60 kW)
IES-EG-2 <b>MACT ZZZZ, NSPS JJJJ</b>	One natural gas-fired emergency generator (36 kilowatt maximum power output)
IES06 <b>MACT DDDDD</b>	One natural gas-fired boiler (4.184 million Btu per hour maximum heat input)

<sup>1</sup> Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement (Federal or State) or that the Permittee is exempted from demonstrating compliance with any applicable requirement.

<sup>2</sup> When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."

## SECTION 4 - GENERAL CONDITIONS (version 8.0, 07/10/2024)

This section describes terms and conditions applicable to this Title V facility.

A. **General Provisions** [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]

1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02Q.
2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.
3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application(s) and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of the Department of Environmental Quality upon request.

C. **Severability Clause** [15A NCAC 02Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [15A NCAC 02Q .0507(e) and 02Q .0508(i)(16)]

Except as otherwise specified herein, one copy of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance  
North Carolina Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. **Title V Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 02Q .0514]  
The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02Q .0514.
2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505]  
The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q.0524 and 02Q .0505.
3. Minor Permit Modifications [15A NCAC 02Q .0515]  
The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.
4. Significant Permit Modifications [15A NCAC 02Q .0516]  
The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.
5. Reopening for Cause [15A NCAC 02Q .0517]  
The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Reporting Requirements [15A NCAC 02Q .0508(f)]  
Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application;
  - b. changes that modify equipment or processes; or
  - c. changes in the quantity or quality of materials processed.If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.
2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]
  - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
  - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
    - i. the changes are not a modification under Title I of the Federal Clean Air Act;
    - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
    - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
    - iv. the Permittee shall attach the notice to the relevant permit.
  - c. The written notification shall include:
    - i. a description of the change;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.
  - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
3. Off Permit Changes [15A NCAC 02Q .0523(b)]  
The Permittee may make changes in the operation or emissions without revising the permit if:
  - a. the change affects only insignificant activities and the activities remain insignificant after the change; or
  - b. the change is not covered under any applicable requirement.
4. Emissions Trading [15A NCAC 02Q .0523(c)]  
To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).

**I.A. Reporting Requirements for Excess Emissions** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

1. "Excess Emissions" - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. *(Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.)*
2. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
3. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
  - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
    - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
      - name and location of the facility;
      - nature and cause of the malfunction or breakdown;
      - time when the malfunction or breakdown is first observed;
      - expected duration; and
      - estimated rate of emissions;
    - ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
    - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

**I.B. Reporting Requirements for Permit Deviations** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

1. "Permit Deviations" - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.
2. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) quarterly by notifying the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

**I.C. Other Requirements under 15A NCAC 02D .0535**

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

**J. RESERVED****K. Permit Renewal** [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least six months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.



L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. **Duty to Provide Information (submittal of information)** [15A NCAC 02Q .0508(i)(9)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 02Q .0508(f) and 02Q .0508(l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303 or through the EPA CEDRI) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all terms and conditions in the permit (including emissions limitations, standards, or work practices), except for conditions identified as being State-enforceable Only. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. whether compliance was continuous or intermittent;
4. the method(s) used for determining the compliance status of the source during the certification period;
5. each deviation and take it into account in the compliance certification; and
6. as possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (CAM) occurred.

Q. **Certification by Responsible Official** [15A NCAC 02Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

R. **Permit Shield for Applicable Requirements** [15A NCAC 02Q .0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
  - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
  - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
  - c. the applicable requirements under Title IV; or

- d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

S. **Termination, Modification, and Revocation of the Permit** [15A NCAC 02Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

T. **Insignificant Activities** [15A NCAC 02Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

U. **Property Rights** [15A NCAC 02Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

V. **Inspection and Entry** [15A NCAC 02Q .0508(l) and NCGS 143-215.3(a)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
  - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. **Confidential Information** [15A NCAC 02Q .0107 and 02Q .0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 02Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.

AA. **Standard Application Form and Required Information** [15A NCAC 02Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.

BB. **Financial Responsibility and Compliance History** [15A NCAC 02Q .0507(d)(3)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 02Q .0501(d)]

1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 02Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. **National Emission Standards Asbestos – 40 CFR Part 61, Subpart M** [15A NCAC 02D .1110]

The Permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

FF. **Title IV Allowances** [15A NCAC 02Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. **Air Pollution Emergency Episode** [15A NCAC 02D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.

HH. **Registration of Air Pollution Sources** [15A NCAC 02D .0202]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).

II. **Ambient Air Quality Standards** [15A NCAC 02D .0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of

the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

**JJ. General Emissions Testing and Reporting Requirements [15A NCAC 02Q .0508(i)(16)]**

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .1110, or .1111 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance for emission sources subject to Rules .0524, .1110, or .1111, the Permittee shall provide and submit all notifications, conduct all testing, and submit all test reports in accordance with the requirements of 15A NCAC 02D .0524, .1110, or .1111, as applicable. Otherwise, if emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
  - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
    - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
    - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
    - iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in 15A NCAC 02D .2600 if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
  - b. The Director may authorize the DAQ to conduct independent tests of any source subject to a rule in 15A NCAC 02D to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the Division of Air Quality using the appropriate testing procedures described in 15A NCAC 02D .2600 has precedence over all other tests.

**KK. Reopening for Cause [15A NCAC 02Q .0517]**

1. A permit shall be reopened and revised under the following circumstances:
  - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
  - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
  - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. the Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.

4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

**LL. Reporting Requirements for Non-Operating Equipment [15A NCAC 02Q .0508(i)(16)]**

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. When permitted equipment is not in operation, the requirements for testing, monitoring, and recordkeeping are suspended until operation resumes.

**MM. Fugitive Dust Control Requirement [15A NCAC 02D .0540]**

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas, stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

**NN. Specific Permit Modifications [15A NCAC 02Q .0501 and .0523]**

1. For modifications made pursuant to 15A NCAC 02Q .0501(b)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
2. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (Air Permitting Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303 or through the EPA CEDRI) in writing at least seven days before the change is made.
  - a. The written notification shall include:
    - i. a description of the change at the facility;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.
  - b. In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

**OO. Third Party Participation and EPA Review [15A NCAC 02Q .0521, .0522 and .0525(7)]**

For permits modifications subject to 45-day review by the federal EPA, EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.